

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

<b>SWEIGERT</b>	<b>CIVIL CASE #:</b>
<b>V.</b>	<b>1:18-CV-08653-VEC</b>
<b>GOODMAN</b>	<b>JUDGE VALERIE E. CAPRONI</b>

**PLAINTIFF'S FIRST VERIFIED STATEMENT IN RESPONSE TO DEFENDANT'S  
ANTI-SLAPP MOTION TO STAY PROCEEDINGS - ECF No. 239**

Plaintiff now provides the verified statement and declaration in support of Plaintiff's response to the pending "ANTI-SLAPP" motion filed by the Defendant as **ECF document no. 239**. This instant document is filed for use in the Court's determination of facts and documents supported by affidavits in considering an "ANTI-SLAPP" motion pursuant to New York C.P.L.R.

3211(11)(g) and Section 76(a)(1) of the New York Civil Rights Law.

Artifacts contained herein and are certified under the penalties of perjury as truthful. All representations included herein are truthful and accurate reproductions of the original sources.

A Certificate of Service appears on the LAST page of this pleading.

Signed this thirteenth (4/13) day of April, 2021.

Respectfully,



D. Geo. Sweigert

***D. GEORGE SWEIGERT  
GENERAL DELIVERY  
NEVADA CITY, CA 95959  
SPOILIATION-NOTICE@MAILBOX.ORG***

### **DECLARATION OF THE PLAINTIFF**

The undersigned hereby swears and affirms that the following artifacts are truthful representation so of the original source documents.

On or about July 30, 2019 the individual known as Manuel Chavez, III of Carson City, Nevada forwarded to the Plaintiff's e-mail message mailbox over one hundred (100) e-mail messages in which he was party.

These e-mail messages forwarded to the Plaintiff included e-mail exchanges between the Defendant and Mr. Chavez. Also included where e-mail messages exchanged with Robert David Steele, Steven Biss, attorney to Steel, Beth "Blackburn" Bogaerts, Dean Fougere, Frank Bacon (aka Tyroan Simpson), Tanya Cornwell and Nathan Stolpmen. All the aforementioned individuals have been identified in one fashion or another as working in a conspiracy against the Defendant.

Displayed below are only the header information of these messages to provide some context as to the parties the Defendant claims were part of a "monetized distributed decentralized defamation campaign". The entire body of these e-mail messages are available.

According to the e-mail message sender, Manuel Chavez, III, aka "DEFANGO" these same identical e-mail messages were sent to the Defendant. The Plaintiff is not included, addressed, or identified in these e-mail messages. The forwarded e-mail messages to the Plaintiff on 7/30/2019 contain copies of e-mail messages sent to the Defendant on July 2, 2019, as seen below:

Discussions in e-mail messages between **Defendant and Manuel Chavez**

Below is a message forwarded to the Plaintiff that depicts e-mail message exchanges between Manuel Chavez, III ([defango@gmail.com](mailto:defango@gmail.com)) and the Defendant ([truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)).

----- Forwarded message -----

From: **Jason Goodman** <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

Date: Wed, Jun 26, 2019 at 4:36 PM

Subject: Re: That JCG Doc you Asked For

To: Defango TV <[defango@gmail.com](mailto:defango@gmail.com)>

I will not, thanks

On Jun 26, 2019, at 7:22 PM, Defango TV <[defango@gmail.com](mailto:defango@gmail.com)> wrote:

Please dont dox my other patreons

On Wed, Jun 26, 2019, 5:56 AM Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)> wrote:

It could be made up. I haven't seen it either.

On another note, there is an interesting angle I thought of with regard to Biss and a bar complaint. Can you please send me a screen capture or email that shows AMABiss signing up for your Patreon and showing Tanya's email address. I will use this as evidence in a court filing and if the judge finds in my favor that this was improper conduct for Biss, that judge's finding can be cited in a letter you would send to the VA state bar in your complaint against him.

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 4:34 PM

Subject: Re: arnon milchan

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

Below is a message forwarded to the Plaintiff that depicts e-mail message exchanges between Manuel Chavez, III ([defango@gmail.com](mailto:defango@gmail.com)) and the Defendant ([truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jun 18, 2019 at 9:55 AM  
Subject: Re: Stuff  
To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

Ya they are not working together anymore after the biss screwed him. We both wanna take RDS out now. He was under the spell for a while and now we have to deal with being a part of his nonsense. Sucks

On Tue, Jun 18, 2019, 12:53 PM Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)> wrote:  
I can help you do that. It might also be helpful to get David's. So is he no longer working with Steele? I saw Seaman appear by Skype in Steele's child trrafficking tribunal

On Jun 18, 2019, at 12:51 PM, Defango TV <[defango@gmail.com](mailto:defango@gmail.com)> wrote:

David already filed the complaint. I need to figure out how to do that correctly

On Tue, Jun 18, 2019, 12:48 PM Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)> wrote:  
As former clients, you and Seaman are in the proper position to file bar complaints against Biss. I am told, since I am technically opposing counsel in the suit, anything I send would be ignored.

On Jun 18, 2019, at 11:39 AM, Defango TV <[defango@gmail.com](mailto:defango@gmail.com)> wrote:

You have some overlay with David Seaman. He was using a biss as lawyer till he fucked him.

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jun 18, 2019 at 11:38 AM  
Subject: Stuff  
To: <[dseaman@gmail.com](mailto:dseaman@gmail.com)>

E-mail message header depicting e-mail messages to **NATHAN STOLPMAN, aka Lift The Veil.**

E-mail message header depicting e-mail messages to NATHAN STOLPMAN, (forwarded) aka Lift The Veil, [lifttheveil@gmail.com](mailto:lifttheveil@gmail.com) and the Defendant [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 2:15 PM

Subject: Fwd: Stealth (@SheepishWolf1) has added you to a group conversation on Twitter!

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>, <[lifttheveil411@gmail.com](mailto:lifttheveil411@gmail.com)>, Esteban Trujillo de Gutierrez <[ma91c1an@pm.me](mailto:ma91c1an@pm.me)>

E-mail message header depicting e-mail messages to NATHAN STOLPMAN (forwarded), aka Lift The Veil, [lifttheveil@gmail.com](mailto:lifttheveil@gmail.com) and the Defendant [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 1:58 PM

Subject: Fwd: Stealth (@SheepishWolf1) has sent you a Direct Message on Twitter!

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>, <[lifttheveil411@gmail.com](mailto:lifttheveil411@gmail.com)>

E-mail message header depicting e-mail messages from **DEAN FOUGERE, aka Titus Frost.**

E-mail message header depicting a forwarded e-mail message to the Defendant (forwarded) of an original e-mail message from Dean Fourge, aka TITUS FROST, at [imperatortruth@startmail.com](mailto:imperatortruth@startmail.com) and Thomas Schoenberger at [tstger13@gmail.com](mailto:tstger13@gmail.com).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 1:24 PM

Subject: Fwd: Hi Nathan and Titus

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Titus Frost** <[imperatortruth@startmail.com](mailto:imperatortruth@startmail.com)>

Date: Tue, Aug 14, 2018 at 3:21 AM

Subject: Re: Hi Nathan and Titus

To: Th Stg <[tstger13@gmail.com](mailto:tstger13@gmail.com)>

Cc: Defango <[defango@gmail.com](mailto:defango@gmail.com)>, Nathan S <[nstolpy@gmail.com](mailto:nstolpy@gmail.com)>, Titus Frost <[imperatortruth@startmail.com](mailto:imperatortruth@startmail.com)>

E-mail message header depicting e-mail messages to **ROBERT DAVID STEELE**.

E-mail message header depicting e-mail message to the Defendant (forwarded) of an original message from Robert David Steele at [robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 12:56 PM

Subject: Fwd: Creating Crypto Currency! Shocking NSA Paper From 1996 Describes Creating Blockchain and Bitcoin

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Robert Steele** <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>

Date: Thu, Dec 21, 2017 at 4:33 PM

Subject: Fwd: Creating Crypto Currency! Shocking NSA Paper From 1996 Describes Creating Blockchain and Bitcoin

To: Defango <[Defango@gmail.com](mailto:Defango@gmail.com)>

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jul 2, 2019 at 12:56 PM

Subject: Fwd: Is there a way for me to DELETE the Steemit account and its content?

To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Robert Steele** <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>

Date: Sat, Dec 16, 2017 at 3:05 PM

Subject: Re: Is there a way for me to DELETE the Steemit account and its content?

To: Defango <[defango@gmail.com](mailto:defango@gmail.com)>

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jun 18, 2019 at 7:59 AM  
Subject: Fwd: what's your situation?  
To: <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Robert Steele** <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>  
Date: Sat, Oct 21, 2017 at 6:23 AM  
Subject: Re: what's your situation?  
To: Defango <[defango@gmail.com](mailto:defango@gmail.com)>

E-mail message header depicting e-mail messages to **STEVEN BISS, attorney for Robert David Steele.**

E-mail message header depicting e-mail messages to STEVEN BISS, attorney for Robert

David Steele, [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net). Thomas Schoenberger is [tstger13@gmail.com](mailto:tstger13@gmail.com)

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jul 2, 2019 at 12:51 PM  
Subject: Fwd: Blind CCed  
To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Th Stg** <[tstger13@gmail.com](mailto:tstger13@gmail.com)>  
Date: Thu, Nov 22, 2018 at 7:32 AM  
Subject: Re: Blind CCed  
To: Defango <[defango@gmail.com](mailto:defango@gmail.com)>  
Cc: Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>

E-mail message header depicting e-mail messages from **BETH “BLACKBURN” BOGAERTS**.

E-mail message header depicting e-mail messages from Beth “Blackburn” Bogaerts, [Foxfire2112@protonmail.com](mailto:Foxfire2112@protonmail.com) (forwarded to Defendant).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jul 2, 2019 at 12:50 PM  
Subject: Fwd: Cease and desist  
To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Beth** <[Foxfire2112@protonmail.com](mailto:Foxfire2112@protonmail.com)>  
Date: Tue, Jun 12, 2018 at 4:40 PM  
Subject: Re: Cease and desist  
To:  
Cc: Defango <[defango@gmail.com](mailto:defango@gmail.com)>, Steven S. Biss <[stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)>

E-mail message header depicting e-mail messages from Beth “Blackburn” Bogaerts, [Foxfire2112@protonmail.com](mailto:Foxfire2112@protonmail.com) (forwarded to Defendant).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Wed, Jun 26, 2019 at 8:51 AM  
Subject: Fwd: HAZMAT  
To: WellTraveledFox <[Foxfire2112@protonmail.com](mailto:Foxfire2112@protonmail.com)>

----- Forwarded message -----

From: **amethetanya** <[atanya1111@gmail.com](mailto:atanya1111@gmail.com)>  
Date: Fri, Jun 30, 2017, 6:47 PM  
Subject: HAZMAT  
To: Robert Steele <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>, Defango <[Defango@gmail.com](mailto:Defango@gmail.com)>



E-mail message header depicting e-mail messages from **TYROAN SIMPSON, aka Frank bacon (forwarded to Defendant).**

E-mail message header depicting e-mail messages from Tyroan Simpson, aka Frank bacon (forwarded to Defendant), e-mail address [tyroan@mac.com](mailto:tyroan@mac.com).

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jul 2, 2019 at 12:50 PM  
Subject: Fwd: [New post] Seeking a Contract (By the Hour) Specialist  
To: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Tyroan Simpson** <[tyroan@mac.com](mailto:tyroan@mac.com)>  
Date: Fri, Dec 15, 2017 at 12:41 PM  
Subject: Fwd: [New post] Seeking a Contract (By the Hour) Specialist  
To: Robert Steele <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>, <[faddat@gmail.com](mailto:faddat@gmail.com)>, <[norcalanon707@protonmail.com](mailto:norcalanon707@protonmail.com)>, <[Defango@gmail.com](mailto:Defango@gmail.com)>, <[Stevenbiss@earthlink.net](mailto:Stevenbiss@earthlink.net)>

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>  
Date: Tue, Jun 18, 2019 at 7:57 AM  
Subject: Fwd: Please do NOTHING in relation to Jason Goodman that is in any way connected to me  
To: <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

Frank Bacon is Tyroan Simpson. The Brother of Tanya Cornwall the wife of Steven Biss

----- Forwarded message -----

From: **Tyroan Simpson** <[tyroan@mac.com](mailto:tyroan@mac.com)>  
Date: Sat, Dec 2, 2017 at 12:14 PM  
Subject: Re: Please do NOTHING in relation to Jason Goodman that is in any way connected to me  
To: Robert Steele <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>  
Cc: Defango <[Defango@gmail.com](mailto:Defango@gmail.com)>, Steven S. Biss <[Stevenbiss@earthlink.net](mailto:Stevenbiss@earthlink.net)>

E-mail message header depicting e-mail messages from **TANYA CORNWELL**, supposed wife of Steven Biss, attorney to Robert David Steele.

E-mail message header depicting e-mail messages from **Tanya Cornwell**, [atanya1111@gmail.com](mailto:atanya1111@gmail.com) supposed wife of Steven Biss, attorney to Robert David Steele.

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jun 18, 2019 at 8:44 AM

Subject: Fwd: sorry!

To: <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>, <[dseaman@gmail.com](mailto:dseaman@gmail.com)>

----- Forwarded message -----

From: **amethetanya** <[atanya1111@gmail.com](mailto:atanya1111@gmail.com)>

Date: Sun, Jul 2, 2017 at 8:49 AM

Subject: sorry!

To: Defango <[Defango@gmail.com](mailto:Defango@gmail.com)>

E-mail message header depicting e-mail messages from **Tanya Cornwell**, [atanya1111@gmail.com](mailto:atanya1111@gmail.com) supposed wife of Steven Biss, attorney to Robert David Steele.

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jun 18, 2019 at 8:44 AM

Subject: Fwd: biggest lie on earth is to hide

To: <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>, <[dseaman@gmail.com](mailto:dseaman@gmail.com)>

----- Forwarded message -----

From: **amethetanya** <[atanya1111@gmail.com](mailto:atanya1111@gmail.com)>

Date: Fri, Jun 30, 2017 at 10:34 PM

Subject: biggest lie on earth is to hide

To: Robert Steele <[robert.david.steele.vivas@gmail.com](mailto:robert.david.steele.vivas@gmail.com)>, Defango <[Defango@gmail.com](mailto:Defango@gmail.com)>

**E-mail message regarding supposed involvement of Defendant with foreign intelligence organizations**

----- Forwarded message -----

From: **Defango** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Nov 21, 2017 at 3:28 PM

Subject: Loomer

To: Manuel Chavez III <[defango@gmail.com](mailto:defango@gmail.com)>

You didn't get this from me, from a Source... Jason Goodman is on the payroll of a man named Arnan Milchan. Arnan has Jason doing work partly out of blackmail. Jason was at parties with a producer named Brian Singer and there were underaged boys and girls. Jason was being paid \$2.788 a week and its now up to \$3500 a week. Laura Loomer is making \$7000 a week from Milchan. Black Cube feed them info. Jason found out that Milchan is paying Loomer twice as much as him and thats why they had this fight. Please do not tell anyone how you got this info. Goodman's job is to deflect attention from Rahm Emanuel , Chuck Schumer and DWS. Rahm secretly paid Pakistani prosecutors 3 million in hush money in March 2009 to make a ton of fraud charges go away. The money came from Israel. The Awan's have been spying for Israel since 2007-2008 with Schumer as the king pin. Now Milchan works with a guy named Avi Hersh. I know you and T and others know some of this stuff, but now you know the full story. Also, Alan Dershowitz has over 7 hours of Orgy Island vid hidden and his vid file is called Insurance, the same name as Schumer's boy Anthony Wiener. Please keep my name out of this. I focus on Vegas and Seth. But this is blow away stuff. Goodman will freak when you expose this. It comes directly from a CIA guy on our team

**E-mail message header depicting e-mail messages from THOMAS SCHOENBERGER**

E-mail message header depicting e-mail messages from Thomas Schoenberger (forwarded to Plaintiff) [tstger13@gmail.com](mailto:tstger13@gmail.com)

----- Forwarded message -----

From: **Defango TV** <[defango@gmail.com](mailto:defango@gmail.com)>

Date: Tue, Jun 18, 2019 at 8:03 AM

Subject: Fwd: Hmmm

To: <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)>

----- Forwarded message -----

From: **Th Stg** <[tstger13@gmail.com](mailto:tstger13@gmail.com)>

Date: Thu, Sep 6, 2018 at 7:03 PM

Subject: Hmmm

To: Defango <[defango@gmail.com](mailto:defango@gmail.com)>

E-mail message of Manuel Chavez, III to the Plaintiff concerning Defendant.

**defango**<defango@gmail.com>

3/25/2021 12:29 AM

To Spoliation Notice **Copy** [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

Thanks,

I have not been working with D. George Swigert in any way to attack Jason Goodman. I have had no contact with Mr. Sweigert outside of these weird emails and wish both parties would leave me alone.

Best,

Manuel Chavez III

On Wed, Mar 24, 2021 at 10:47 AM Spoliation Notice <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)> wrote:  
Many thanks.

But the question before the Court is this:

Have you been working with D. George Sweigert in a plan to attack Jason Goodman.

That is Mr. Goodman's allegations.

Best,

The undersigned hereby attests that the foregoing exhibits are true reproductions of the original source documents.

Signed this thirteenth (4/13) day of April 2021.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Geo. Sweigert". The signature is stylized with a large, sweeping "S" and a distinct "G".

D. Geo. Sweigert

**CERTIFICATE OF SERVICE**

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the thirteenth (4/13) day of April, two thousand and twenty-one (2021).

<b>Clerk of the Court, Room 200</b> <a href="mailto:temporary_pro_se_filing@nysd.uscourts.gov">temporary_pro_se_filing@nysd.uscourts.gov</a>	<b>Jason Goodman, CEO</b> <a href="mailto:truth@crowdsourcethetruth.org">truth@crowdsourcethetruth.org</a>
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***D. GEORGE SWEIGERT***  
***Pro Se Non-Attorney***  
***GENERAL DELIVERY***  
***NEVADA CITY, CA 95959***